Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20054

In the Matter of	)	
	)	CC Docket No. 95-116
Telephone Number Portability	)	DA 96-358

SUPPLEMENTAL REPLY COMMENTS OF MFS COMMUNICATIONS COMPANY, INC.

Andrew D. Lipman
Mark Sievers

SWIDLER & BERLIN, CHARTERED
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
(202) 424-7500

Attorneys for
MFS COMMUNICATIONS
COMPANY, INC.

Dated: April 5, 1996

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20054

In the Matter of	)	
	)	CC Docket No. 95-116
Telephone Number Portability	)	DA 96-358

SUPPLEMENTAL REPLY COMMENTS OF MFS COMMUNICATIONS COMPANY, INC.

Table of Contents

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20054

In the Matter of	)	
	)	CC Docket No. 95-116
Telephone Number Portability	)	DA 96-358

SUPPLEMENTAL REPLY COMMENTS OF MFS COMMUNICATIONS COMPANY, INC.

MFS Communications Company, Inc. ("MFS"), by its undersigned counsel and pursuant to Section 1.415 of the Commission's rules, submits these supplemental reply comments in response to the Commission's request for further comments focusing on the impact of the Telecommunications Act of 1996[1] on the above captioned Notice of Proposed Rulemaking.[2]

INTRODUCTION

These comments reply to comments filed by others and provide recommendations in three areas. First, the comments clearly indicate that permanent number portability is feasible using a Location Routing Number ("LRN") architecture. The Commission should order the immediate implementation of LRN as a mechanism to achieve permanent number portability. Second, since number portability is feasible, the Telecommunications Act requires that the Commission focus on determining the competitively neutral manner of recovering costs from all telecommunications carriers. MFS offers a mechanism in its comments and responds to others in this reply. Third, the Commission cannot leave interim number portability to the states to

---

1 Telecommunications Act of 1996, Pub. L. 104-104, 110 Stat. 56 (1996).

2 *In the Matter of Number Portability*, Notice of Proposed Rulemaking, CC Docket 95-116, RM8535, 10 FCC Rcd 12350 (Released July 13, 1995). ("Notice")

determine but must: (1) order that interim number portability be provided and, (2) develop a competitively neutral mechanism for recovering the costs of interim number portability.

I. PERMANENT NUMBER PORTABILITY USING LRN IS TECHNICALLY FEASIBLE AND SHOULD BE ORDERED

MFS agrees with the advice given by NARUC that "the FCC should use the data gathered in this proceeding and from State implementation proceedings to establish nationwide policy guidelines concerning ... number portability."[3] The data from this proceeding and state implementation proceedings clearly indicate that permanent number portability is technically feasible and that the industry consensus is that LRN is the appropriate technology for permanent number portability. Almost without exception, the comments concluded that LRN is the technology that the industry and state regulators are embracing for permanent number portability.[4] MFS agrees with Ameritech when it recommends that "the Commission can expedite deployment and help prevent waste and inefficiency if it prescribes the architecture for long term number portability that has already been adopted in several states, including Illinois, Maryland, California, and Georgia."[5] LRN is the number portability architecture adopted everywhere that has considered permanent number portability; the Commission should adopt LRN as the architecture for permanent number portability.

Even though the comments of the New York Department of Public Service indicated that "the New York Commission has endorsed LRN as the long-term implementation method" for

---

3 NARUC Comments at pg. 1.

4 AT&T Comments, Ameritech Comments at pp. 7-9, New York Department of Public Service Comments at pg. 1, MCI Comments at pp. 3-7, California Cable TV Association Comments at pp. 2-7, Sprint Comments at pp. 2-4, Time-Warner Comments at pp. 6-7, Association for Local Telecommunications Services Comments at pg. 4, and TCG Comments at pp. 7-8.

5 Ameritech Comments at pg. 5.

number portability in New York,[6] NYNEX curiously insists that LRN is not a long term number portability solution, but merely an addressing scheme.[7] Pacific Bell does not argue that permanent number portability is infeasible, but criticizes LRN as too narrow, and advocates that local exchange carriers should be allowed to choose the number portability technology that best suits their needs.[8] GTE does not argue that LRN cannot be used as the technology for permanent number portability, but argues that while the "LRN proposal has been favorably received in a number of states, reliable cost estimates of LRN have not been resolved,"[9] and thus, further study is warranted.

The only commentors who counsel the Commission to delay the implementation of number portability are the incumbent local exchange carriers who have an obvious economic interest in erecting competitive barriers to thwart the development of local telephone competition. NYNEX, for example, asks the Commission to direct the Alliance for Telecommunications Industry Solutions ("ATIS") to develop a technically feasible number portability solution[10] in spite of the fact that more than one industry task force in state proceedings have already concluded that LRN is the appropriate architecture for permanent number portability. In its comments, BellSouth acknowledges that "at least nine states have endorsed an LRN call model for a long term number portability solution" but it recommends that the Commission establish an industry work group to study long term number portability and report back to the Commission on the full range of operational impacts.[11]

---

6 New York Department of Public Service Comments at pg. 1.

7 NYNEX Comments at pg. 5.

8 Pacific Bell Comments at pp. 3-5.

9 GTE Comments at pg. 5.

10 NYNEX Comments at pg. 4, footnote 3.

11 BellSouth Comments at pg. 7.

As AT&T indicates in its comments, the LRN database development process was forecasted at 18 months in the Illinois workshops, switch vendors are prepared to implement LRN by the second quarter of 1997 and full number portability can be implemented within two years in the top 84 MSAs.[12] More comments and studies, as suggested by incumbent local exchange carriers, serve no useful purpose and should be rejected. The Commission should simply order permanent local number portability using LRN.

Some commentors suggested that number portability be implemented when local exchange carriers receive a *bona fide* request for number portability[13] or that rural telephone companies should have sharply reduced obligations to provide number portability.[14] They argue that it is not sound policy to require number portability where no competition exists. As a mechanism to avoid wasteful investments but comply with the requirements of the Telecommunications Act, MFS suggests that the Commission require that permanent number portability be implemented by a local exchange carrier within 18 months of an NXX code being activated in the Local Exchange Routing Guide ("LERG") and assigned to a competitor.

II. NUMBER PORTABILITY IS TECHNICALLY FEASIBLE -- THE TELECOMMUNICATIONS ACT REQUIRES THAT THE COMMISSION FOCUS ON COMPETITIVELY NEUTRAL COST RECOVERY

Even if there were some legitimate debate about the appropriate architecture for number portability, clearly, permanent number portability is technically feasible. As a policy matter, given that number portability is technically feasible, the Telecommunications Act requires that the Commission determine the competitively neutral cost recovery mechanisms.

---

12 AT&T Comments at pp. 5-6.

13 USTA Comments at pg. 3.

14 OPASTCO Comments at pp. 5-9.

MFS was the only party to offer specific comments on the appropriate mechanism for cost recovery. In its comments, MFS suggested that there are two types of costs associated with number portability: (1) the common or shared costs incurred to establish, maintain and administer the common or shared number portability database and associated general facilities and procedures; and, (2) the costs which each individual carrier must incur to conform its own network, its own operating, signaling and routing procedures, and its own operational and administrative support systems. Competitive neutrality requires that only the common or shared costs be recovered from all telecommunications carriers.[15] An individual carrier's network costs, however, should not be included in the costs of number portability to be recovered from other carriers. Clearly, it would not be competitively neutral to allow carriers to recover from competing telecommunications providers any of a carrier's individual number portability costs or any portion of the carrier's share of the common number portability costs. Likewise, it would not be competitively neutral if an incumbent local exchange carrier simply inflated its interconnection charges to cover its number portability costs.

GTE's suggested definition of competitive neutrality is wrong. GTE suggests that a competitively neutral cost recovery mechanism is one that does not create an incentive for a customer to either stay with an existing provider/service or to move to a new provider/service to avoid any or all of the cost of portability.[16] The Telecommunications Act, however, requires that the costs of number portability be recovered from all telecommunications carriers, and does not

---

15 MFS suggested that any recovery of common or shared number portability costs (permanent or interim) be based on carriers' revenues net of payments to intermediaries and that there be strict rules prohibiting recovery of any individual costs from services provided to other telecommunications providers. In addition, and as described in Section III below, MFS suggested that because interim number portability is an inferior form of number portability, it should be provided to new entrants at no charge. As described in Section III, below, In instances of interim number portability, the Commission should also order a flow through of terminating compensation.

16 GTE Comments at pg. 4.

mandate end-user charges. Certainly, carriers might pass-on their number portability obligations to their end-users (or their shareholders), but fundamentally, the Act requires that number portability costs be borne by telecommunications carriers. Likewise, the duty to provide number portability is one of the interconnection duties imposed on local exchange carriers who interconnect with other carriers. In that statutory context, competitive neutrality does not refer to end-user incentives as GTE suggests, but rather, requires an analysis of charges assessed to other, competing telecommunications carriers.

In a footnote, SBC suggests that competitive neutrality require that "the Commission consider the principles of cost causation and cost/benefit in its adoption of rules."[17] There is absolutely nothing in the Telecommunications Act that requires that number portability costs be apportioned based on a cost/benefit analysis or on principles of cost causation. It simply requires that the costs of number portability "shall be borne by all telecommunications carriers on a competitively neutral basis."[18]

Without support of any kind, OPASTCO asserts that implementation of number portability for smaller carriers will cost a lot, "possibly leading to increased rates which could force subscribers to drop off the network."[19] USTA argues that technical feasibility should be defined to include consideration of whether a carrier is economically capable of making the required investments.[20] Bell Atlantic claims that number portability costs in Maryland are estimated to range between $64 and $124 million;[21] Pacific Bell argues that it will cost it $1

---

17 SBC Comments at pg. 2, footnote 4.

18 47 U.S.C. § 251(e)(2).

19 OPASTCO Comments at pp. 6-7.

20 USTA Comments at pg. 4.

21 Bell Atlantic Comments at pg. 2.

billion over three years to implement LRN.[22] Apart from incumbents' obvious incentives to inflate their cost estimates to delay number portability, these cost estimates are irrelevant. The Telecommunications Act requires number portability; number portability is not an optional service. Irrespective of how incumbent local telephone carriers feel about number portability, Congress has made a fundamental national policy decision that the public benefits such number portability brings to promoting local service competition exceed the costs of implementing number portability. The Commission's statutory directive is to determine how to recover those costs in a competitively neutral manner from all telecommunications carriers.

Ameritech suggests that the Commission appoint a Joint-Board to consider cost recovery issues.[23] BellSouth and NYNEX suggest that the Commission open a separate Notice of Proposed Rulemaking to consider costing issues[24] whereas Bell Atlantic argues that cost recovery cannot be left for a further proceeding at a later date but must be resolved as part of any decision about number portability but offers no suggestions for cost recovery.[25] These suggestions should be recognized for what they are -- attempts to delay number portability and thwart the development of local telephone competition. The Commission can and should set recovery rules in this proceeding as suggested by MFS in its comments.

III. THE COMMISSION MUST ALSO ORDER INTERIM NUMBER PORTABILITY AT COMPETITIVELY NEUTRAL RATES

Some commentors observed that the Telecommunications Act does not affect the Commission's responsibilities in the area of interim number portability. Ameritech, for example,

---

22 Pacific Bell Comments at pg. 7.

23 Ameritech Comments at pp. 2, 4.

24 BellSouth Comments at pp. 7-8; NYNEX Comments at pg. 4.

25 Bell Atlantic Comments at pp. 1-2.

argues that since remote call forwarding ("RCF") and direct inward dialing ("DID") trunks are available, the Commission need not take any further action on interim number portability.[26] Likewise, BellSouth argued that the Commission should not interfere with states' efforts in requiring RCF and DID as interim number portability solutions[27] and Bell Atlantic argued that there is no need under the Act for the Commission to take any action with respect to interim number portability arrangements. Those arguments are absolutely untrue.

At the most basic level, not all states have ordered interim number portability or concluded their inquiries into interim number portability. Unless the Commission orders interim number portability new entrants will have to litigate (and win) the issue in all 50 states, the District of Columbia and Puerto Rico. Thus, the failure of the Commission to create a national number portability mandate -- permanent or interim -- raises a substantial barrier to entry.

When it requires that the costs of number portability be borne by all telecommunications carriers on a competitively neutral basis, Section 251(e)(2) of the Telecommunications Act does not distinguish between full and interim number portability. Thus, the same competitively neutral cost recovery that applies to full number portability should apply to interim number portability with some modifications that recognize the inferior nature of interim number portability. No state requires that the costs of interim number portability be borne by all telecommunications carriers on a competitive neutral basis. Rather, tariffed rates for RCF and DID typically apply, and new entrants pay 100% of the costs of interim number portability and provide whatever contribution is embedded in the tariffed rates for RCF and DID trunks. That is not competitively neutral and does not spread the costs among all carriers.

---

26 Ameritech Comments at pp. 6-7.

27 BellSouth Comments at pp. 5-6.

Rather than leave interim number portability to the states, as suggested by the incumbent local exchange carriers, the Commission must establish pricing and costing guidelines for interim number portability offerings as required by the Telecommunications Act. MFS suggests that interim number portability be provided at no charge to new entrants for at least three reasons. First, the incremental costs of providing RCF and DID trunks to new entrants are small. Second, if interim number portability services are provided at no charge, that will create economic incentives for incumbent local exchange carriers to move forward with permanent number portability. Third, interim number portability services degrade the quality of service provided to new entrants while incumbents enjoy a higher grade of service for their customers. As the Commission has done with inferior grade access services, a steep discount is an entirely appropriate mechanism to ensure competitive neutrality.[28]

If charges are applied to interim number portability, the costs of such offerings should be apportioned among all telecommunications carriers based on their revenues net of payments to intermediaries as described in MFS's comments. In addition, in setting pricing and costing standards for interim number portability, to ensure competitive neutrality, the Commission should require a flow-through of terminating compensation. For example, if a call terminates to an incumbent local exchange carrier and is then forwarded to a new entrant pursuant to an RCF form of interim number portability, then the local exchange carrier should not be allowed to collect terminating compensation for the call that it forwards to the new entrant. A carrier's incentive to serve a customer will be blunted and competition distorted unless the carrier receives all of the terminating compensation associated with that customer. Likewise, under permanent number portability a carrier can be expected to receive all the terminating compensation, so it is entirely appropriate that the same hold true for interim portability.

---

[28] MCI Comments at pg. 8.

IV. CONCLUSIONS

The Commission should order LRN as the appropriate architecture for permanent number portability since the comments filed indicate that this is the industry consensus number portability standard. Since number portability is clearly feasible, the Commission should focus on developing a competitively neutral cost recovery of number portability costs from all telecommunications carriers using the structure MFS suggests in its comments. The Commission should not leave interim number portability to be resolved exclusively by state regulators. The Telecommunications Act requires that the Commission establish competitively neutral cost recovery of both interim and permanent number portability.

Respectfully submitted,

Andrew D. Lipman

Andrew D. Lipman
Mark Sievers

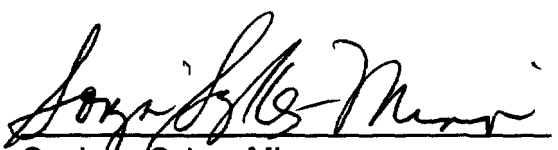
SWIDLER & BERLIN, CHARTERED
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
(202) 424-7500

Attorneys for
MFS COMMUNICATIONS
COMPANY, INC.

Dated: April 5, 1996

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of April 1996, copies of the foregoing SUPPLEMENTAL REPLY COMMENTS OF MFS COMMUNICATIONS COMPANY, INC.; CC Docket No. 95-116, DA 96-358, were served via Messenger*, or via First Class Mail, U.S. postage prepaid, to all parties on the attached service list.



Sonja L. Sykes-Minor

William F. Caton*
Secretary
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Policy and Program Planning Division*
Common Carrier Bureau
Room 544
1919 M Street, N.W.
Washington, D.C. 20554

ITS, Inc. *
Room 246
1919 M Street, N.W.
Washington, D.C. 20554

Betsy L. Anderson
Duane K. Thompson
Attorneys for BELL ATLANTIC
1320 N. Court House Road
Arlington, VA 22201

Lisa M. Zaina
General Counsel
OPASTCO
21 Dupont Circle, N.W.
Suite 700
Washington, D.C. 20039

John Malloy, Esq.
Vice President and General Counsel
GO COMMUNICATIONS CORPORATION
201 North Union Street, Suite 410
Alexandria, VA 22314

Robert C. Schoonmaker
Vice President
GVNW INC./MANAGEMENT
2270 La Montana Way
Colorado Springs, CO 80918

David C. Jatlow
Young & Jatlow
Attorneys for THE ERICSSON CORPORATION
2300 N Street, N.W.
Suite 600
Washington, D.C. 20037

James R. Hobson
Donelan, Cleary, Wood & Master, P.C.
Attorneys for NATIONAL EMERGENCY NUMBER ASS'N
1100 New York Avenue, N.W., Suite 750
Washington, D.C. 20005-3934

R. Michael Senkowski
Jeffrey S. Linder
Stephen J. Rosen
Wiley, Rein & Fielding
Attorneys for PERSONAL COMMUNICATIONS INDUSTRY ASS'N
1776 K Street, N.W.
Washington, D.C. 20006

Richard A. Askoff
Attorney for NATIONAL EXCHANGE CARRIER ASS'N, INC.
100 S. Jefferson Road
Whippany, NJ 07981

Catherine R. Sloan/Richard L. Fruchterman/
Richard S.Whitt
Attorneys for WORLDCOM, INC.
d/b/a LDDS WORLDCOM
1120 Connecticut Ave., N.W., Suite 400
Washington, D.C. 20036

Richard J. Metzger
General Counsel
ASS'N FOR LOCAL TELECOMMUNICATIONS SERVICES
1200 19th Street, N.W.
Suite 560
Washington, D.C. 20036

Ellen S. Deutsch
Associate General Counsel
Citizens Utilities Company
of California
1035 Placer Street
Redding, CA 96001

Victoria A. Schlesinger, Esq.
TELEMATION INTERNATIONAL, INC.
6707 Democracy Blvd.
Bethesda, MD 20817

Ann E. Henkener
Assistant Attorney General
Public Utilities Section
Office of the Attorney General of Ohio
30 East Broad Street
Columbus, OH 43215-3428

Emily C. Hewitt
General Counsel
GENERAL SERVICES ADMINISTRATION
18th & F Streets, N.W.
Room 4002
Washington, D.C. 20405

Michael Altschul
Vice President and General Counsel
CELLULAR TELECOMMUNICATIONS INDUSTRY ASS'N
1250 Connecticut Avenue, N.W.
Suite 200
Washington, D.C. 20036

William Barfield
Jim Llewellyn
BELLSOUTH CORPORATION
Suite 1800
1155 Peachtree Street, N.E.
Atlanta, GA 30309-3610

Dan L. Poole
Jeffrey S. Bork
Attorneys for US WEST, INC.
1020 19th Street, N.W.
Suite 700
Washington, D.C. 20036

Jere W. Glover, Esq.
Chief Counsel
Office of Advocacy
UNITED STATES SMALL BUSINESS ADMINISTRATION
409 Third Street, S.W. , Suite 7800
Washington, D.C. 20416

Gordon F. Scherer
President and Chief Executive Officer
SCHERERS COMMUNICATIONS GROUP, INC.
575 Scherers Court
Worthington, OH 43085

Richard A. Muscat
Assistant Attorney General
STATE OF TEXAS
P.O. Box 12548, Capitol Station
Austin, TX 78711-2548

Margot Smiley Humphrey
Koteen & Naftalin
Attorney for TDS TELECOM
1150 Connecticut Avenue, N.W., Suite 1000
Washington, D.C. 20036

Mark C. Rosenblum/John J. Langhauser
Clifford K. Williams
AT&T CORP.
295 North Maple Avenue
Room 3244J1
Basking Ridge, NJ 07920

J. Manning Lee
Vice President, Regulatory Affairs
Attorney for TELEPORT COMMUNICATIONS GROUP, INC.
Two Teleport Drive, Suite 300
Staten Island, NY 10311

Glenn S. Richards
Fisher Wayland Cooper Leader & Zaragoza L.L.P.
Attorney for TELESERVICES INDUSTRY ASS'N
2001 Pennsylvania Avenue, N.W., Suite 400
Washington, D.C. 20006

William L. Roughton, Jr.
Attorney for PCS PRIMECO, L.P.
1133 20th Street, N.W.
Suite 850
Washington, D.C. 20036

Larry A. Peck
Frank Michael Panek
AMERITECH
Room 4H86
2000 West Ameritech Center Dr.
Hoffman Estates, IL 60196-1025

David Cosson
Marie Guillory
NATIONAL TELEPHONE COOPERATIVE ASSOCIATION
2626 Pennsylvania Ave., N.W.
Washington, D.C. 20037

Mary McDermott
Linda Kent
Charles D. Cosson
U.S. TELEPHONE ASS'N
1401 H Street, N.W.
Suite 600
Washington, D.C. 20005

Robert S. Foosaner
Lawrence R. Krevor
Laura L. Holloway
NEXTEL COMMUNICATIONS, INC.
800 Connecticut Ave., N.W.
Suite 1001
Washington, D.C. 20006

Jay C. Keithley
Norina T. Moy
Kent Y. Nakamura
SPRINT CORPORATION
1850 M St., N.W., Ste. 1110
Washington, D.C. 20036

Harold L. Stoller
Richard S. Wolters
Special Assistants Attorney General
Counsel for ILLINOIS COMMERCE COMMISSION
527 East Capitol Ave.
P.O. Box 19280
Springfield, IL 62794-9280

Lucie M. Mates
Theresa L. Cabral
Sarah Rubenstein
PACIFIC BELL
140 New Montgomery Street
Room 1526
San Francisco, CA 94105

Albert Halprin
Melanie Haratunian
Halprin, Temple, Goodman & Sugrue
Attorneys for YELLOW PAGES PUBLISHERS ASS'N
1100 New York Avenue, N.W., Suite 650, East Tower
Washington, D.C. 20005

Mark Stachiw
AIRTOUCH PAGING
Three Forest Plaza
12221 Merit Drive, Suite 800
Dallas, TX 75251

Carl W. Northrop
Bryan Cave LLP
Attorney for AIRTOUCH PAGING/ARCH COMMUNICATIONS GROUP
700 Thirteenth Street, N.W.
Suite 700
Washington, D.C. 20005

John T. Scott, III
Crowell & Moring
Attorney for BELL ATLANTIC NYNEX MOBILE, INC.
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2595

Paul Glist/Christopher Savage/John C. Dodge
Cole, Raywid & Braverman
Attorneys for JONES INTERCABLE, INC.
1919 Pennsylvania Avenue, N.W.
Suite 200
Washington, D.C. 20006

Brian Conboy/Sue Blumenfeld/Thomas Jones
Willkie, Farr & Gallagher
Attorneys for TIME WARNER
COMMUNICATIONS HOLDINGS, INC.
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20036

Joel Levy
Cohn and Marks
Attorneys for the National Wireless Resellers
Ass'n
1333 New Hampshire Ave., N.W.
Washington, D.C. 20036

Werner K. Hartenberger
Dow, Lohnes & Albertson
Attorney for
THE AD HOC COALITION OF COMPETITIVE
CARRIERS
1255 23rd Street, N.W., Suite 500
Washington, D.C. 20037

David J. Gudino
GTE SERVICE CORPORATION
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20036

Daniel L. Brenner
Counsel for NATIONAL CABLE TELEVISION
ASS'N, INC.
1724 Massachusetts Ave., N.W.
Washington, D.C. 20036

Maureen Thompson
NYNEX TELEPHONE COMPANIES
1095 Avenue of the Americas
New York, NY 10036

Ellen S. LeVine
Attorney for
THE PEOPLE OF THE STATE OF CALIFORNIA
AND THE CALIFORNIA PUBLIC UTILITIES
COMMISSION
505 Van Ness Avenue
San Francisco, CA 94102

Charles C. Hunter
Hunter & Mow, P.C.
Attorney for
TELECOMMUNICATIONS RESELLERS ASS'N
1620 I Street, N.W., Suite 701
Washington, D.C. 20006

Paul Rodgers
General Counsel
NARUC
1102 ICC Building
P.O. Box 684
Washington, D.C. 20044

David L. Kahn
c/o Bellatrix International
4055 Wilshire Blvd., Suite 415
Los Angeles, CA 90010

Robert M. Lynch
SBC COMMUNICATIONS INC.
175 E. Houston, Room 1262
San Antonio, TX 78205

Alan J. Gardner
CALIFORNIA CABLE TELEVISION ASS'N
4341 Piedmont Avenue
Oakland, CA 94611

Stephen Kraskin
Kraskin & Lesse
Attorney for U.S. INTELCO NETWORKS, INC.
2120 L Street, N.W., Suite 520
Washington, D.C. 20037

Judith St. Ledger-Roty
Reed Smith Shaw & McClay
Attorneys for PAGING NETWORK, INC.
One Franklin Square
Suite 1100 East Tower
Washington, D.C. 20005

Danny Adams
Wiley, Rein & Fielding
Attorneys for
COMPETITIVE TELECOMMUNICATIONS ASS'N
1776 K Street, N.W.
Washington, D.C. 20006

Jeffrey Olson, Esq.
Paul, Weiss, Rifkind, Wharton & Garrison
Attorney for U.S. AIRWAVES, INC.
1615 L Street, N.W., Suite 1300
Washington, D.C. 20036

Mark O'Connor
Piper & Marbury
Attorney for OMNIPOINT CORPORATION
1200 19th Street, N.W.
Seventh Floor
Washington, D.C. 20036

Loretta Garcia
Donald Elardo
MCI TELECOMMUNICATIONS, INC.
1801 Pennsylvania Ave., N.W.
Washington, D.C. 20006

Edwin N. Lavergne
Ginsburg, Feldman and Bress, Chartered
Attorney for INTERACTIVE SERVICES ASS'N
1250 Connecticut Ave., N.W.
Washington, D.C. 20036

Roger W. Steiner
Assistant General Counsel
MISSOURI PUBLIC SERVICE COMMISSION
P.O. Box 360
Jefferson City, MO 65102

Richard F. Nelson
911 System Support Dept.
MARION COUNTY BOARD OF COUNTY COMMISSIONERS
2631 S.E. 3rd STreet
Ocala, FL 34471-9101

Bruce Hagen
Susan E. Wefald
Leo M. Reinbold
NORTH DAKOTA PUBLIC SERVICE COMMISSION
600 E. Boulevard
Bismarck, ND 58505-0480

Robert M. Gurss
Wilkes, Artis, Hedrick & Lane, Chartered
Attorney for ASSOCIATION OF PUBLIC SAFETY COMMUNICATIONS OFFICIALS INTERNATIONAL, INC.
1666 K Street, N.W., #1100
Washington, D.C. 20006

Mary E. Burgess
Staff Counsel
NEW YORK STATE DEPARTMENT OF PUBLIC SERVICE
Three Empire State Plaza
Albany, NY 12223-1350

Thomas Taylor
Frost & Jacobs
Attorneys for CINCINNATI BELL
2500 PNC Center
201 East Fifth Street
Cincinnati, OH 45202

Pat Wood, III, Chairman
Robert W. Gee, Commissioner
Judy Walsh, Commissioner
PUBLIC UTILITY COMMISSION OF TEXAS
7800 Shoal Creek Blvd.
Austin, TX 78757

Cynthia B. Miller
Associate General Counsel
FLORIDA PUBLIC SERVICE COMMISSION
Capital Circle Office Center
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Denny Byrne
INDUSTRY NUMBERING COMMITTEE
1401 H Street, N.W., Suite 600
Washington, D.C. 20005-2190